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Date 11 July 2018

RE: 6/2018/1635/OUTLINE – Historic De Havilland Grass Runway, Ellenbrook fields, Hatfield Business Park

Dear Mark,

Thank you for your consultation in relation to the above planning application for the outline permission for the change of use of land to an airfield with runway and support facilities, at Historic De Havilland Grass Runway, Ellenbrook fields, Hatfield Business Park.

We have reviewed the list of supporting documents and note that a Flood Risk Assessment has not been included.

We acknowledge that the current planning application is for outline permission. However it is important that certain details are confirmed to ensure that the most appropriate drainage scheme can be implemented to ensure there will be no flood risk to the site and the surrounding area and to demonstrate that an appropriate scheme using the key principles of SuDS are feasible.

In the absence of a FRA we object to this application and recommend refusal of planning permission until a satisfactory FRA with a surface water drainage strategy has been submitted.

Details for the management of surface water drainage is required under the NPPF for all Major Planning Applications as amended within the NPPG from the 6 April 2015. In the absence of details of the approach to surface water drainage strategy, the flood risks resulting from the proposed development are unknown. The absence of a surface water drainage strategy is therefore sufficient reason in itself for a refusal of planning

permission.

In order for us to advise the Local Planning Authority on the suitability of this proposal, the drainage strategy should as a minimum include the following:

1. A statement of compliance with the NPPF and NPPG policies, LPA local plan policies and HCC SuDS Guidance and Policies.
2. Anecdotal information on existing flood risk with reference to most up to date data and information.
3. Location and extent of any ordinary watercourse, existing and potential flood risk from all sources including existing overland flow routes, groundwater, flooding from ordinary watercourses referring to the national EA fluvial (River) and surface water flood maps.
4. Evidence of ground conditions/ underlying geology, permeability including BRE Digest infiltration tests and topographical survey to metres AOD.
5. An outline drainage strategy which includes a commitment to providing appropriate SuDS in line with the non-statutory national standards, industry best practice and HCC Guidance for SuDS.
6. Detailed calculations of existing surface water storage volumes and flows.
7. Initial post development calculations/ modelling in relation to surface water are to be carried out for all rainfall events up to and including the 1 in 100 year including an allowance for climate change.
8. Evidence that if the applicant is proposing to discharge to the local sewer network, they have confirmation from the relevant water company that they have the capacity to take the proposed volumes and run-off rates.
9. Identify opportunities to improve flood risk directly by the development site or contribution to local flood risk scheme where appropriate.
10. Details of required maintenance of any SuDS features and structures and who will be adopting these features to the lifetime of the development.

Overcoming our objection

The updated flood maps of flooding from surface water published by the Environment Agency indicate that there are predicted ponding areas from surface water on the development site. Therefore, we require information of how the applicant intends to manage the surface water flows and volumes.

We understand the applicant intends to infiltrate into the ground all the run-off from the development site. We would expect as a minimum the geology to be confirmed with permeability tests to establish at the outset the feasibility of the proposed drainage strategy. Tests should be conducted to BRE Digest 365 Standards and record the levels of ground water. If infiltration is not feasible then an alternate scheme based on attenuation and discharge should be provided.

We would advise the applicant that the drainage proposal should manage any potential contaminants from surface water run-off from the proposed development. Therefore, the proposal should consider appropriate treatment stages arising from the development.

We require the overall run-off rate and the required storage volume to ensure that the proposed drainage strategy can attenuate for all rainfall events up to and including the 1 in 100 year plus climate change event.

As the site is currently a Greenfield area, we require that any discharge from the development site be limited to the Greenfield run-off rate. Additionally, we would expect that any attenuation and storage should be provided above ground and not within underground features.

On the 19th February 2016, the updated climate change allowances were released to support NPPF. Therefore all Flood Risk Assessments and Drainage strategy for planning applications validated on or after this date should apply the updated climate change allowances when calculating peak rainfall intensity. Looking at worst case scenario, for the design of SuDS feature we recommend that the upper end allowance should be applied.

The applicant should explain if there is an existing drainage system, how it works and if it is intended to be used. The applicant must demonstrate that if they intend to connect to the local surface water sewer that the water company accepts the proposed discharge rate. As the LLFA, we need to ensure that all the opportunities to improve the situation on site and in the surrounding area of the development have been considered.

We would like to highlight that there is a main river and an ordinary watercourse crossing the site. Therefore, we expect to find an assessment of these features included within the drainage strategy for the site.

We would like to remind the applicant any works proposed to be carried out that may affect the flow within an ordinary watercourse will require the prior written consent from the Lead Local Flood Authority under Section 23 of the Land Drainage Act 1991. This includes any permanent and or temporary works regardless of any planning permission. In addition, any changes to a main river may require Environment Agency's consent.

The LLFA has produced a surface water drainage advice webpage which contains a Developers Checklist and Guide, HCC SuDS Policies and reference to other technical guidance. We ask that the LPA advises the applicant to review this information prior to submitting a surface water drainage strategy.

<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/>

Informative to the LPA

As the site area is above 1 ha, a formal FRA is required under the National Planning Policy Framework (NPPF). We recommend the LPA to obtain a Flood Risk Assessment for the proposed development site.

We recommend the LPA to obtain a maintenance plan that explains and follows the manufacturer's recommendations for maintenance or that it follows the guidelines explained by The SuDS Manual. A maintenance plan should also include an inspection timetable with long term action plans to be carried out to ensure efficient operation and prevent failure. For further guidance on the maintenance of SuDS components, please refer to the SuDS Manual by Ciria.

We would advise the LPA to contact the Environment Agency in relations to any concerns they may have for water quality due to the future potential for conformation on the site.

The applicant can overcome our objection by submitting a FRA with a surface drainage assessment which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall, and gives priority to the use of sustainable drainage methods.

If this cannot be achieved we are likely to maintain our objection to the application.

We ask to be re-consulted when the amended FRA with surface drainage assessment will be submitted. We will provide you with bespoke comments within 21 days of receiving formal reconsultation. Our objection will be maintained until an adequate FRA with a drainage strategy has been submitted.

Yours sincerely,

Julia Puton
SuDS Officer
Hertfordshire County Council